

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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In Re: NEURONTIN MARKETING, SALES )  
PRACTICES AND PRODUCTS LIABILITY ) MDL Docket  
LITIGATION ) No. 1629  
 ) Master File

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THIS DOCUMENT RELATES TO: ) No. 04-10981  
THE GUARDIAN LIFE INSURANCE ) VOLUME I  
COMPANY OF AMERICA v. PFIZER, )  
INC., 04 CV 10739 (PBS) )  
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Telephonic Deposition of  
DR. SANDER GREENLAND, taken at  
22333 Swenson Drive, Topanga,  
California, commencing at  
1:38 P.M., Wednesday, May 5, 2010,  
before Harry Hansen, CSR No. 4907.

Job No. CS256526

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1 APPEARANCES OF COUNSEL:

2  
3 FOR THE PLAINTIFF:

4  
5 FINKELSTEIN & PARTNERS

6 BY: KEITH ALTMAN, ESQ.

7 PRESENT TELEPHONICALLY)

8 1279 Route 300

9 Newburgh, New York 12551

10 (845) 563-9540

11  
12 FOR PFIZER, INC.:

13  
14 GOODELL DeVRIES LEECH AND DANN LLP

15 BY: RICHARD M. BARNES, ESQ.

16 STEVEN NAPOLITANO, ESQ.

17 PRESENT TELEPHONICALLY)

18 One South Street

19 Suite 2000

20 Baltimore, Maryland 21202

21 (419) 783-4000

1 APPEARANCES OF COUNSEL (CONTINUED):

2  
3 FOR PFIZER, INC.:

4  
5 WHEELER TRIGG O'DONNELL LLP

6 BY: ANDREW M. MYERS, ESQ.

7 PRESENT TELEPHONICALLY)

8 1801 California Street

9 Suite 3600

10 Denver, Colorado 80202-2617

11 (303) 244-1800  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
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1 from the hazard ratio for suicide attempts and  
2 completed suicide; correct?

3 A. Right. Whereas if I was trying to be more  
4 precise in terms of matching like with like, I would  
5 have taken instead the rate ratio from figure 5,  
6 which is 2.61. So I would have come up with a  
7 little bit higher overall calculation for  
8 gabapentin's effect.

9 Q. But that would have been only more precise  
10 in terms of the calculation and not more precise in  
11 terms of the event that you were using to make your  
12 calculation; correct?

13 A. Correct.

14 Q. So can you tell me if there is a  
15 recognized physical term for the products of a odds  
16 ratio for suicidal thoughts and actions and the  
17 hazard ratio for just suicide actions?

18 A. Well, I can give you conditions under  
19 which it would provide an estimate for precisely  
20 what I was talking about, which is the gabapentin  
21 effect relative to placebo.

22 Q. Let me ask you this.

23 Can you cite for me the name of any paper  
24 that you have ever published where you have  
25 multiplied the hazard ratio from an observational

1 drug versus drug comparison subject via an odds  
2 ratio from a placebo study where you calculate the  
3 risk of any drugs relative to a placebo?

4 A. No.

5 Q. Can you cite me any paper anywhere in the  
6 world that has multiplied the hazard ratio of an  
7 observational drug versus drug comparison by an odds  
8 ratio from a placebo-controlled study to calculate  
9 the new estimate of the risk of any drugs relative  
10 to placebo?

11 A. No.

12 Q. Have you ever performed this type of  
13 analysis before you did it in this case?

14 A. I can't recall.

15 Q. Why did you take the results of the  
16 Patorno paper for your calculation and not the  
17 results of the Olesen paper?

18 A. Let's see. Let me look at the -- what the  
19 results you're talking about are.

20 Well, actually it was because I was  
21 talking about the Patorno paper at that point  
22 specifically, and I was talking about what its  
23 implications would be. That's "a study in the  
24 United States just like the FDA's studies were  
25 largely in the U.S. So that's it.

1           Q.    Why did you not use the statement analysis  
2    which is the subject of the Olesen paper?

3           A.    I don't know.  I could do that if you  
4    want.

5           Q.    Do you agree that if you pick statistics  
6    from another paper, another observational paper, you  
7    would get a different result than you obtained from  
8    your statement based on the Patorno paper?

9           A.    Let's do it.  Let's go ahead and look at  
10   the 1.27 hazard ratio from figure 2 of Olesen and  
11   we'll go 1.27 times the 2.61 in the FDA.  So we've  
12   got, by quick calculation, we get 3 point something.  
13   We get -- In fact I can do the exact calculation if  
14   you want.

15                   That's 3.3.

16          Q.    Are you -- Aren't you missing something  
17   that the reference drug in the Olesen paper is  
18   carbamazepine and not topiramate?

19          A.    Well, you just said let's do the  
20   calculation.  So I said you want me to do the  
21   calculation.  There's a reason you just gave to not  
22   focus on that.  They were taking -- Olesen was  
23   taking things relative to carbamazepine.  And the  
24   fact is that in the FDA report carbamazepine was  
25   very, very poorly estimated.

1 Q. Dr. , what you have to do is you have to  
2 take the odds ratio of carbamazepine in the FDA  
3 meta-analysis and multiply it by 1.27 in the Olesen  
4 papers; correct?

5 A. Yes, I think you're correct.

6 Q. So if I, in the carbamazepine analysis or  
7 carbamazepine data from figure 2, it is a ratio of  
8 .65, and multiply is by 1.27 --

9 A. I get --

10 Q. -- correct?

11 A. I get .81.

12 Q. Get what?

13 A. I get .81.

14 Q. So if you take the data from the Olesen  
15 paper of a hazard ratio of 1.27 and multiply it by  
16 the reference drug carbamazepine and get the odds  
17 ratio of the FDA analysis of .65 is actually that  
18 gabapentin has an increased risk of suicide versus  
19 placebo; correct?

20 MR. ALTMAN: Objection.

21 Form.

22 THE WITNESS: Well, it doesn't  
23 demonstrate. The estimate comes out as .81, which  
24 is on the protective side, but the confidence levels  
25 would be extremely wide.